

1 Maurice VerStandig, Esq.  
Nevada Bar No.: 15346  
2 THE VERSTANDIG LAW FIRM, LLC  
1452 W. Horizon Ridge Pkwy, #665  
3 Henderson, NV 89012  
Telephone: (301) 444-4600  
4 Facsimile: (301) 444-4600  
Email: mac@mbvesq.com  
5 *Attorneys for the Plaintiffs*

6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA  
8

9 ADAM HERSHMAN, on behalf of himself  
and all others similarly situated, *et al.*

10 Plaintiffs,

11 vs.

12 FULL SPECTRUM LASER LLC,

13 Defendant.

Case No. 2:21-cv-2245-CDS-BNW

**STIPULATION AND [PROPOSED]  
ORDER**

14 Come now Adam Hershman (“Mr. Hershman”) and Sumit Singh (“Mr. Singh”),  
15 individually and on behalf of the collective of plaintiff herein (collectively, the “Plaintiffs”), and  
16 Full Spectrum Laser, LLC (“FSL” or the “Defendant”), by and through respective undersigned  
17 counsel, and by stipulation move this Honorable Court as follows:

18 While the parties are prepared to file a pre-trial statement in this case, they respect and  
19 appreciate that the Defendant has not yet had occasion to take post-class closure. The Plaintiffs  
20 equally believe that reopening discovery would be beneficial to all parties, even if only for a  
21 limited period of time, so as to permit a more detailed exploration of certain facts in a pre-trial  
22 posture.  
23

1 Accordingly, the parties jointly move this Honorable Court to (i) reopen discovery in this  
2 case, to and through a date sixty (60) days from the date of entry of an order approving this  
3 stipulation; and (ii) direct the filing of a joint pre-trial order thirty (30) days after the close of  
4 discovery.

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6 Dated: February 21, 2025

7 /s/ Maurice B. VerStandig  
8 Maurice VerStandig, Esq.  
9 Nevada Bar No.: 15346  
10 THE VERSTANDIG LAW FIRM, LLC  
11 1452 W. Horizon Ridge Pkwy, #665  
Henderson, Nevada 89012  
Telephone: (301)444-4600  
Email: mac@mbvesq.com  
*Attorney for the Plaintiffs*

/s/ Jeffrey Hulet (signed w/ express permission)  
Jeffrey Hulet, Esq.  
Nevada Bar No. 10621  
Hogan Hulet PLLC  
10501 W. Gowan Road, Suite 260  
Las Vegas, Nevada 89129  
Telephone: (702) 800-5482  
jeff@h2legal.com  
*Attorney for Full Spectrum Laser LLC*

12 **IT IS SO ORDERED.**

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**United States District/Magistrate Judge**